

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

MAIL PROCESSING NETWORK RATIONALIZATION
SERVICE STANDARD CHANGES, 2012

DOCKET NO. N2012-1

INTERROGATORIES OF DAVID B. POPKIN TO THE UNITED STATES POSTAL
SERVICE [DBP/USPS-12 through 16]

David B. Popkin hereby requests the United States Postal Service to answer, fully and completely, the following interrogatories pursuant to the Commission's Rules of Practice and Procedure. Any reference to testimony or other sources should indicate the page and line numbers. The instructions contained in the interrogatories DFC/USPS-T1-1-6 in Docket MC2006-7 dated February 23, 2007, are incorporated herein by reference. I am available for informal discussion to respond to your request to "clarify questions and to identify portions of discovery requests considered overbroad or burdensome."

December 15, 2011

Respectfully submitted,

N20121B12

DAVID B. POPKIN, POST OFFICE BOX 528, ENGLEWOOD, NJ 07631-0528

DBP/USPS-12 This Interrogatory is designed to show the combined results of the outstanding Postal Service requests.

Assume that I am a customer of a facility that is convenient for me to mail a letter prior to the weekday dispatch of 4 PM and this office is closed and that as replacement I now receive delivery service on a rural route operating from a neighboring post office and the carrier passes my house at 2 PM,

Scenario #1 = I have a First-Class Mail letter destined to a neighboring town [presently in the overnight service area] that is ready to mail at 3 PM on Wednesday. Under the existing conditions, I walk over to my local post office and the letter is dispatched at 4 PM Wednesday and delivered on Thursday.

Under the combined effects of the outstanding USPS requests, I place the letter in the rural box at my curb at the same 3 PM Wednesday. The carrier will pick up the letter at 2 PM Thursday and bring it back to the new facility for dispatch. The letter will now be scheduled for 2-day standard for delivery on Saturday. Since Saturday delivery has been eliminated, the letter will be delivered Monday which is four days after the existing conditions [If there is a Monday holiday it would be delivered Tuesday or five days after the existing conditions].

Scenario #2 = I have a First-Class Mail letter destined to a location some 400 miles away [presently in the 2-day service area and proposed for 3-day delivery] that is ready to mail at 3 PM on Tuesday. Under the existing conditions, I walk over to my local post office and the letter is dispatched at 4 PM Tuesday and delivered on Thursday.

Under the combined effects of the outstanding USPS requests, I place the letter in the rural box at my curb at the same 3 PM Tuesday. The carrier will pick up the letter at 2 PM Wednesday and bring it back to the new facility for dispatch. The letter will now be scheduled for 3-day standard for delivery on Saturday. Since Saturday delivery has been eliminated, the letter will be delivered Monday which is four days after the existing conditions [If there is a Monday holiday it would be delivered Tuesday or five days after the existing conditions].

Please confirm the above scenarios or explain if you are unable to confirm.

DBP/USPS-13 Are there any ZIP Code pairs that presently have a 3-day delivery standard for First-Class Mail that under the proposed standards would have a 2-day delivery standard and if so, please enumerate them?

DBP/USPS-14 [a] It is proposed to have a four hour drive time from the originating facility to the destinating SCF for a 2-day delivery standard for First-Class Mail. If the drive time is exactly four hours, will that have a 2-day or 3-day delivery standard?

[b] Will that dividing line as noted in subpart [a] between 2-day and 3-day delivery standards for First-Class Mail be applied consistently throughout the contiguous 48 states? If not, please provide details of the ZIP Code pairs along with an explanation of the reasons why certain ZIP Code pairs will either not meet the criteria or exceed it.

DBP/USPS-15 [a] For each of the following processing facilities, please provide a listing of those SCF destinating locations that are within a four hour drive time from the originating facility:

1. New York NY Morgan 100
2. Teterboro NJ NNJ Metro 076
3. Kearny NJ DVD 070

The listing should show the drive time for each of the facilities that are on the list in addition to the name of the SCF.

[b] For each SCF that is listed one or more times in the response to subpart [a], please provide the 3-digit ZIP Codes that are included in the given SCF.

[c] Will the responses to subpart [b] change as consolidation of processing plants takes place and if so, will the new facilities location be the replacement SCF?

DBP/USPS-16 Does the current Docket contemplate any changes to Part 3 of the Postal Operations Manual as it relates to collection services? If so, please provide details.